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No. _____

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In The

Supreme Court of the United States

October Term, 1998

IN RE: CHARLES A. MUER
ESTATE OF CHARLES A. MUER, DECEASED,
Petitioner,

C.A. MUER CORP.,
Plaintiff,

v.

ROBERT A. KARBEL,
PERSONAL REPRESENTATIVE OF THE ESTATE OF
GEORGE F. DRUMMEY AND LYNNE DRUMMEY,
Respondent.

Petition For A Writ Of Certiorari To The United States Court of Appeals For The Sixth Circuit

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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COUNTER-STATEMENT OF QUESTION PRESENTED

Once a district court has properly ruled that a claimant under the Limitation of Liability Act (LOLA), 46 U.S.C. §183 is entitled to proceed with his claim in state court under the saving to suitors clause; may the district court nonetheless continue to accept and decide motions on LOLA issues?

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I. THE PETITION SHOULD BE DENIED BECAUSE THE DECISION OF THE SIXTH CIRCUIT VACATING THE LEGAL AND FACTUAL DETERMINATIONS OF THE DISTRICT COURT ON NON-LOLA ISSUES WAS TOTALLY CONSISTENT WITH

EXISTING PRECEDENT AND RAISES NO NOVEL OR IMPORTANT QUESTIONS WORTHY OF DETERMINATION BY THIS COURT. FURTHERMORE, THE ISSUE UPON WHICH PETITIONER NOW RELIES WAS NEVER RAISED BELOW. 9

A. There is no legal basis for the argument that a district court, recognizing its obligation to return a case to state court under the savings to suitor's clause, should or even may make any determination outside the scope of LOLA itself. 9

B. The stipulations made by the Claimant in this case were exactly what the law requires of a Claimant wishing to lift a stay of state court proceedings and did not enlarge power of the district court to make rulings on non-LOLA issues over Claimant's timely objection. 14

C. Petitioner is attempting to raise an entirely new argument in this court. 16

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OPINIONS BELOW

Claimant[1] agrees with the petitioner's statement concerning Opinions Below.

STATEMENT OF JURISDICTION

Claimant concedes that the Petition for Writ of Certiorari has been timely filed in this matter and that jurisdiction is proper under 28 U.S.C. § 1254(1).

STATUTES INVOLVED

Claimant agrees that the Petitioner has properly set forth the relevant statutes.

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[1] Because of the overlapping terminology between the LOLA proceedings, this petition and Karbel's cross-petition, we refer to Karbel as "claimant" throughout.

COUNTER-STATEMENT OF THE CASE

A. Introduction

Contrary to petitioner's introduction and its question presented, the real issue in this case centers on the oft-noted tension between the right of a LOLA petitioner to obtain limitation in federal court and the right of a claimant to proceed in state court under the saving to suitors clause.

In *Langnes* v. *Green*, 282 U.S. 531, 51 S. Ct. 243, 75 L.Ed. 520 (1931) the Court recognized that, in single-claim cases not raising a need for concursus, a claimant's right to proceed in state court under the saving to suitor's clause requires that the District Court exercise discretion in favor of allowing the state action to proceed. The balance is logical and straightforward: the federal court has exclusive jurisdiction over all LOLA questions and the state court exercises jurisdiction, without interference from the federal court, over all non-LOLA questions. In this case, however, the district court profoundly upset that balance by refusing to rule on claimant's request to return the case to state court until *after* it had ruled on motions concerning where the boat sank and whether Death on the High Seas Act (DOHSA) 46 U.S.C. § 761 would apply. Worse, it allowed petitioner to file new motions on DOHSA issues *after* the file had been re-opened in state court. The Sixth Circuit ruled, as it was compelled to under *Langnes* and every other authority, that once the right

to return to state court is established, the court may not consider non-LOLA questions.

Nonetheless, petitioner claims - for the first time in this Court - that the district court was compelled under *Black Diamond Steamship Corp.* v. *Robert Stewart and Sons, Ltd.*, 336 U.S. 386; 69 S. Ct. 622, 93 L.Ed. 754 (1949) to decide whether DOHSA or the general maritime law would apply to this case. In petitioner's view, if application of (DOHSA) would result in the value of the claim being at or less than the value of the vessel and its pending freight, then the proceeding would have to be dismissed. Thus, the court would have no choice but to determine the applicable law as a threshold jurisdictional matter. Not only is this an overstatement of *Black Diamond* (which involved no saving to suitors issue) but the court in our case was making rulings in violation of *Langnes* long before it, or even the petitioner, believed that choosing and applying DOHSA would bring the claims to an amount within the value of the vessel and eliminate the district court's need to continue the LOLA action. Further, there is no contention that the court needed to consider factual or legal issues arising under DOSHA in order to determine the other motions properly before it:

(1) Claimant's motion to dismiss the LOLA action for inability of the petitioner to state a claim under LOLA, or;

(2) Whether Claimant presented a case appropriate under

Langnes for return to state court under the saving to suitor's clause.

Nothing in this petition merits review by this Court. There is no split among the circuits on the questions raised below and nothing approaching clear error by the Sixth Circuit. If there is novelty in this case, it is in the extent to which the district court deviated from both the logic and letter of all existing precedent. Thus, there is little reason to believe that a question of this nature would likely recur.

B. Factual Background

Claimant accepts the factual background provided by the petitioner, with the following additions. (The facts set out here are only those pertinent to the issues raised in the petition to which this brief responds. Additional facts relevant to the Claimant's cross petition are provided therein.)

The final voyage of the Muer vessel (named "Charley's Crab") began on the morning of March 12, 1993. The vessel was captained by Mr. Charles A. Muer. On board also were his wife, Betty, and appellant's decedents, George and Lynne Drummey.

Although all had sailed together in the past, Mr. Muer was by far the more experienced sailor and clearly captain of the vessel. Weather reports indicated that the vessel would encounter high seas and storms coming into Florida. Nonetheless, the vessel proceeded toward the Florida Coast.

It was sighted and photographed at approximately 2:45 p.m. on March 12th by a government surveillance plane but was never seen again. At 4:30 a.m. on March 13th, a 911 telephone call was made from a cellular phone on Charley's Crab and received at a cellular tower in Lantana, Florida just a few miles south of the vessel's intended destination at the Lake Worth Inlet on the Coast of Florida. The call lasted only a few seconds and a voice connection was never made before the call terminated. Because no one on shore had been informed of the intended time of arrival, it was not appreciated for two more days that the vessel was overdue. Consequently, a coordinated search was not initiated until Monday, March 16th. This may explain why neither the vessel, its passengers nor wreckage was ever found.

C. Procedural Background

Claimant accepts petitioner's statement of the procedural background of this case with the following exceptions and additions:

- Claimant does not agree that the general maritime law action is applicable only if the deaths occurred within the territorial waters of any state. Although the Sixth Circuit did not reach this issue, Claimant has consistently argued that in circumstances like this one, in which it is known that the vessel sank close to the three mile limit but cannot be conclusively placed on either side of it, the general maritime

cause of action provided for in *Moragne v. State Marine Lines, Inc.*, 398 U.S. 375, 90 S. Ct. 1772, 26 L.Ed. 2d 339 (1970) would apply *unless* a party asserting DOHSA (in this case the petitioner) carries the burden of proof of establishing that the occurrence was more than a marine league from shore.[2]

- The concession attributed to Claimant on page 9 of the petition that Claimant did not believe *at that time* that it could establish that the sinking was less than four to five marine leagues from shore, came early in discovery. Later evidence, made available before the District Court dismissed the case, suggested that the vessel might well have made it to within three miles of shore. Petitioner had conceded all along that the vessel might have made it within five miles of shore: just two miles from the all-important three-mile limit.

- The petition suggests at page 11 that claimant waited until the hearing on February 1, 1996, to argue that the District Court should in no event decide petitioner's motion for summary judgment: it should either dismiss the LOLA action altogether or return the matter to state court for decisions on the merits. This argument was in fact set forth

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[2] This issue is not pertinent to this petition but it is crucial in the state proceedings which have continued since the Sixth Circuit's decision. Claimant raises it here strictly to avoid any later suggestion that the petitioner's contentions about *Moragne* have been conceded by Claimant.

clearly in claimant's motions and briefs as well.

- Although claimant had conceded that the case was, as a practical matter, over if the court refused to allow non-pecuniary losses to be recovered, there were claims still pending for memorial service expenses. These claims, though small, would still have been in excess of the $500 stipulated value of the vessel. This fact becomes important when the *Black Diamond* case is considered, because even these amounts would have precluded the argument that the limitation found exceeded the pending claims, warranting dismissal.

- It is incorrect that claimant never argued in the Sixth Circuit that the District Court should not have decided petitioner's first motion: claimant was steadfast in its opposition to any and all decisions by the District Court on the merits of the case.

D. The District Court's March 14, 1996 Opinion and Order

Claimant accepts petitioner's description of the court's March 14, 1996 opinion and order and events surrounding it, except that claimant did not admit in interrogatory answers that there was no pecuniary loss: only that the persons claiming non-pecuniary losses were without pecuniary damages and were not claiming economic loss based on any loss of support from the decedents. Memorial service

expense claims had been alleged in the complaint and preserved in the same interrogatory answers that conceded lack of direct pecuniary losses for the individuals.

E. Remaining Issues in the District Court

Claimant accepts petitioner's summary of the issues remaining in the district court after the March 14, 1996 Opinion and Order and the manner of their disposition. However, it should be noted that claimant has never conceded that the court was correct to place upon the Claimant the burden to establish that the sinking occurred less than three miles from shore. DOHSA, 46 U.S.C. §761 *et seq.* by its terms, establishes that he who would invoke it must show that the occurrence was more than three miles from shore. Nonetheless, the important thing for purposes of this petition is that the district court continued to rely upon judicial economy as justification for it's exercise of jurisdiction in derogation of state court jurisdiction under the saving to suitors clause.

More important, even assuming that the district court in its final round of summary judgment motions could have preceded its action by reasserting a stay of the state court proceedings, it failed to do so, finding that "judicial economy" was alone sufficient to allow it to make rulings in the case on issues that were properly within the jurisdiction of the state court simultaneously. There is no legal reason why

claimant could not have attempted to file his own motion on the same issues in the state court thereby igniting a race to judgment with inevitable issues of *res judicata* and preemption.

F. The Sixth Circuit's Decision

Claimant accepts petitioner's description of the rulings made by the Sixth Circuit.

REASONS FOR DENYING THE WRIT

The petition should be denied because the decision of the Sixth Circuit vacating the legal and factual determinations of the district court on non-LOLA issues was totally consistent with existing precedent and raises no novel or important questions worthy of determination by this court. Furthermore, the argument upon which petitioner now relies was never raised below.

A. THERE IS NO LEGAL BASIS FOR THE ARGUMENT THAT A DISTRICT COURT, RECOGNIZING ITS OBLIGATION TO RETURN A CASE TO STATE COURT UNDER THE SAVINGS TO SUITOR'S CLAUSE, SHOULD -- OR EVEN MAY -- MAKE ANY DETERMINATIONS OUTSIDE THE SCOPE OF LOLA ITSELF.

On March 14, 1996, the district court specifically granted claimant's motion to lift the stay of state court proceedings, at page 11 of its Memorandum Opinion and Order. The court's order did not indicate in any way that it intended to "ride shotgun" with the state court judge by allowing the parties to litigate in two courts at once. While claimant has been able to find no case in which a LOLA petitioner has attempted to keep litigating in the federal court after a stay of state court proceedings had been lifted, the very absence of such cases suggests that the procedure is inappropriate. It is difficult to imagine how such a process could be countenanced, whether the matter is analyzed in terms of judicial economy, comity or the saving to suitors clause itself.

In *Gorman v. Cerasia,* 2 F.3d 519 (3rd Cir. 1993), the case relied upon by the district court in lifting the stay, the Third Circuit held:

> . . . we now decide, in agreement with the Second Circuit in *Dammers [Complaint of Dammers v. Vanderheid*, 836 F2d 750 (2nd Cir. 1988)], that as long as the priority stipulations filed in the district court ensure that the shipowner will not be exposed to competing claims to the limited fund representing the value of his or her vessel, the district court may authorize the parties to

proceed with the state court action. *We believe that this is a reasonable method of reconciling the two applicable federal statutes, one "saving to suitors" their common law remedies, including the right to a jury trial, and the other protecting an innocent shipowner from claims above the value of the ship and its cargo.* 2 F3d 519, 526. (emphasis added).

The emphasized language in the quotation underscores the fact that the saving to suitors clause carries with it a federal policy which compels lifting of the stay in appropriate proceedings.

The Supreme Court has recognized not only the competence of state courts to administer maritime rights and remedies, but also the state courts' specially defined role in DOHSA cases. In *Offshore Logistics v. Tallentire*, 477 U.S. 207, 106 S. Ct. 2485, 91 L.Ed. 2d 174 (1986), Justice O'Connor interpreted § 7 of DOHSA, 46 U.S.C. § 767, which reads in part:

> The provisions of any state statute giving or regulating rights of action or remedies for death shall not be affected by this chapter . . .

The plaintiffs in that case, seeking to apply state remedies to a death occurring outside territorial waters, argued that § 7

clearly expressed a congressional intent to allow state courts not only to *hear* maritime claims but to determine them according to their own laws. However, while rejecting the power of a state court to apply its own substantive law in place of DOHSA, Justice O'Connor for the majority said:

> The "saving to suitors" clause leaves state courts competent to adjudicate maritime causes of action in proceedings in personam and means that "a state 'having concurrent jurisdiction, is free to adopt such remedies, and to attach to them such incidents, as it sees fit' so long as it does not attempt to [give in rem remedies or] make changes in the 'substantive maritime law.' [Madruga v. Superior Court, 346 U.S. 556, 560, 74 S. Ct. 298, 98 L.Ed. 290 (1954)]
>
> . . .
>
> Because the resolution of DOHSA claims does not normally require the expertise that admiralty courts bring to bear, DOHSA actions are clearly within the competence of state courts to adjudicate. *Offshore Logistics v. Tallentire*, 477 U.S. 207, 232; 106 S. Ct. 2485, 91 L.Ed. 2d 174 (1986), 222-232.

This analysis disposes of the argument that the federal

court is a preferable forum for the adjudication of DOHSA claims that have been filed in state court to begin with.

If *Langnes* means anything, it means that a plaintiff has the right to have so much of his lawsuit tried in state court as does not invade the exclusive province of the district court under LOLA. Every case which has allowed a claimant to return to state court has done so only upon the claimant stipulating to the right of the LOLA court to ultimately determine all issues peculiar to LOLA, even to the point that the judgment in state court may not be deemed *res judicata* as to questions of the owner's knowledge or privity of the negligence. However, the language used to describe the extent of the res judicata waiver supports the notion that the LOLA court does not have plenary power over all factual or legal determinations. See e.g. *Gorman v. Cerasia*, 2 F3d 519, 528 (3rd Cir. 1993):

> We agree ... that the potential overlap between the factual questions raised in the limitation proceeding (whether the maritime mishap occurred "without the privity or knowledge" of the shipowner), and those to be litigated in the state tort action (whether the shipowner acted unreasonably) requires that a claimant seeking to vacate the stay concede both the district court's exclusive jurisdiction to decide all limitation issues and expressly agree to

waive any "claim of res judicata relevant to the issue of limited liability based on any judgment obtained in the state court."

If the district court, in the final analysis, had the right to determine *all* issues relevant to the existence or extent of the owner's potential liability, rather than the issues peculiar to the statute (the limitation fund and the owner's knowledge or privity) then logic would require that a claimant wishing to return to state court waive *res judicata* effects relative to every material issue in the case. What then would be the purpose of the state proceeding? We respectfully submit that if the right of a claimant to proceed in state court is not to be rendered a mere rehearsal, there must be a clear demarcation between the territory reserved to state court and that over which the admiralty court has exclusive control. LOLA itself suggests the boundary by speaking to only two questions: administration of the limitation fund and the knowledge or privity of the owner.

B. THE STIPULATIONS MADE BY THE CLAIMANT WERE EXACTLY WHAT THE LAW REQUIRES OF A CLAIMANT WISHING TO LIFT A STAY OF STATE COURT PROCEEDINGS AND DID NOT ENLARGE THE POWER OF THE DISTRICT COURT TO MAKE RULINGS ON NON-LOLA ISSUES OVER

CLAIMANT'S TIMELY OBJECTION.

Petitioner next contends that the stipulations which the claimant offered to the district court in order to perfect his right to return to state court under *Langnes* were insufficient because they were conditional. The stipulations themselves were not conditional at all: they conformed to like stipulations filed in every case of this nature. The claimant merely asked that, prior to accepting them and returning the case to state court, the district court consider an anterior question: was the LOLA action proper in the first place. Petitioner cites no case and offers no logic for the proposition that a claimant must make an irrevocable election to either forfeit an attack upon the merits of LOLA proceeding or his right under the saving to suitors clause and *Langnes* to return to state court.

The purpose of the stipulations is to ensure that before returning to state court the claimant is committed to honoring the LOLA court's right to conclude limitation proceedings before a state court judgment is enforced. *Petition of Red Star Barge Line, Inc.*, 160 F2d 436 (2nd Cir.), cert. denied, 331 U.S. 850, 91 L.Ed. 1859, 67 S. Ct. 1741 (1947); *Complaint of Dammers v. Vanderheid*, 836 F.2d 750 (2nd Cir. 1988). Thus, there is no threat to the district court's control of the case or petitioner's right to be free of judgments in excess of the value of the vessel and its freight in allowing a claimant to mount a Rule 56 attack on the LOLA proceeding while still

in federal court and before filing irrevocably his stipulations.

C. PETITIONER IS ATTEMPTING TO RAISE AN ENTIRELY NEW ARGUMENT IN THIS COURT

The petitioner and the district court justified disposition of DOHSA questions on the basis of judicial economy and the assumption that the admiralty court was better able to consider the issues at hand than its state court counterpart. Petitioner now says that the court needed to decide whether DOHSA would apply, under compulsion from *Black Diamond Steamship Corp.* v. *Robert Stewart and Sons, Ltd.*, 336 U.S. 386, 69 S. Ct. 622, 93 L.Ed. 754 (1949.) This argument is making its debut in this Court. An examination of the Sixth Circuit's decision and petitioner's briefs below will show that this argument has never been previously asserted, nor did petitioner or the district court believe at the time the district court was acting that it was necessary to consider DOHSA questions for jurisdictional reasons.

It is fundamental that this court will generally not consider issues not presented to the courts below, absent extraordinary circumstances. Subject matter jurisdiction can certainly be an exception: however any suggestion that the court needed to consider DOHSA issues in order to establish or maintain its subject matter jurisdiction is unfounded. To

begin with, LOLA has never been determined a jurisdictional statute[3]: LOLA petitioners must establish jurisdiction under 28 U.S.C. §1333 or face dismissal. *Lewis Charters, Inc. v. Huckins Yacht Corp.*, 871 F.2d 1046 (11th Cir. 1989) (limitation action which based on occurrence in non-navigable waters, dismissed for want of §1333 jurisdiction.); *In re Three Buoys Houseboat Vacations*, 878 F2d 1096, 1100 (8th Cir. 1989) (a cause of action does not arise under the Limitation of Liability Act. Instead, the act is "more akin to a defense").

D. EVEN IF *BLACK DIAMOND* IS CONSIDERED, IT DOES NOT CHANGE THE OUTCOME.

Should the Court be willing to consider the *Black Diamond* argument at this stage of the proceedings, it would not change the outcome.

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[3] In *Sisson v. Ruby*, 497 US 358, 111 L.Ed. 2d 292, 110 S. Ct. 2892 (1990), n.1, the Court expressly declined to pass on this issue, finding that jurisdiction was sustainable under 46 U.S.C. §1333(1). In *Jerome Grubart, Inc. v. Great Lakes Dredge and Dock*, 513 U.S. 527, 115 S. Ct. 1043, 130 L.Ed. 1024 (1995), the Court was presented with the question but, again, decided the issue on the basis of §1333(1).

In *Black Diamond*, a collision involving a U.S. vessel had occurred in Belgian waters, raising the strong possibility that Belgian limitation laws would apply. If they did, the liability would be capped at a figure less than the stipulated value of the vessel. The lower courts had ruled that this, in turn, would render the LOLA proceeding unnecessary. On the other hand, since the petitioner had posted a bond based on the Belgian limitation, the amount would be insufficient if the lower limitation were not applied: once again, leading to dismissal for failure to post adequate security. The Court disposed of the issue by holding that, even if the value of ship were greater than the cap on liability, it was still not greater than the aggregate claims; therefore concursus was still necessary and dismissal of the petition would not occur. The Court declined to decide which law would apply on the record before it and remanded, with the following added remarks.

> It is important to add, moreover, that the question of what law governs the substantive limit of liability should be determined upon remand in advance of the proof of individual claims. A proceeding to limit liability is *ipso facto* a proceeding to limit recovery, and the amount of the applicable limit, like the value of the vessel and freight, is a question affecting the magnitude of the res from which recovery is sought. It is a question, therefore,

> which lies at the threshold of all claims, is equally relevant to all, and should accordingly be disposed of before any. 336 U.S. 386 , 398

There are several important distinctions between *Black Diamond* and this case.

1. The choice of law question in *Black Diamond* would determine the size of the fund without consideration of the merits of individual claims, and affect important LOLA issues such as the adequacy of the bond and release of any impounded vessels. The court made that the focus of its admonition by saying that the choice of law question would affect the "magnitude of the res". In our case, the magnitude of the res is forever fixed at the nominal value set with the vessel at the bottom of the ocean.

2. DOHSA does not establish a limit on liability *per se* but rather a limit on who may make claim and for what. Unlike the fixed limit involved with a statute that sets a formula or arbitrary cap, the amount still remains uncertain until a fact-specific inquiry is made. Thus, it does not lend itself to threshold determination and does not affect all claimants simultaneously unless they happen to be identically situated on the special facts of their claims.

3. *Black Diamond* involved no issue of tension between LOLA and the saving to suitor's clause. Thus, there was no need to strike a balance between the jurisdiction of the

LOLA court and any other.

4. Even if there had been saving to suitors issues, because of the multiple claim aspects and the need for concursus, saving to suitors jurisdiction would have been required to give way to admiralty jurisdiction, again making balancing of rights and sensitivity to forum unnecessary;

5. The substantive law in *Black Diamond* involved a choice of limitation laws: the Belgian scheme which would have reduced the potential recovery for all claims to an amount less than the value of the ship versus American law which would not. The choice of law issue involved in *Black Diamond* was purely a legal question, as distinguished from this case, in which the law to be applied involves mixed questions of law (interpretation of DOHSA) and fact (where the vessel sank). To the extent that the place of the sinking is a jury-submissible issue, it implicates precisely the right granted a claimant under the savings to suitor's clause to be in state court.

6. In *Black Diamond*, the courts below believed that a determination that Belgian law applied would effectively end the case in a single stroke. However, in this case the district court ruled on DOHSA issues in two steps. In its ruling of March 14, 1996, the petitioner had not asked for a ruling on claimant's survival claims, conscious pain and suffering endured by the decedents prior to their demise. The district court specifically excluded that issue from

consideration in its opinion and order. (Appendix, pp 36a-37a.) Thus, the petitioner never argued, the court never believed, and it was not in fact the case that resolution of that issue would potentially have terminated the LOLA action. Even in the second phase, though the claimant had conceded that as a *practical* matter, the economic loss claims were insignificant, they had not been formally stipulated out of the case. Since the value of the ship had been set at a stipulated amount of only $500, even the costs which would have been taxable to the claimant had he prevailed, for such matters as filing fees, witness and transcript fees, would have exceeded the value of the fund and therefore would have made continuation of LOLA jurisdiction technically necessary.

In short, the distinctions between *Black Diamond* and this case outweigh the similarities. Furthermore, if *Black Diamond* were carried to the lengths suggested by petitioner, the LOLA court, even *after* having determined that the case was to be returned under *Langnes* to state court, could make any number of decisions pertinent to the potential recoveries, such as statute of limitations, determination of heirs, dependency, types of damages recoverable, waiver, release, accord, satisfaction and a host of other purely legal questions loosely fitting under the heading "law to be applied."

CONCLUSION AND RELIEF SOUGHT

The claimant contends that the petitioner presents a

case that does not merit certiorari. Its issues are not new and the circuits are not split. The more important questions arising from this case are presented in our conditional cross-petition. They have to do with whether this proceeding, or any LOLA matter involving allegations of actual rather than vicarious fault against an owner, should be allowed to proceed as a device for undercutting saving to suitors jurisdiction. We understand that, as a conditional cross-petition, ours cannot be granted unless this one is. We ask that either both be denied or that both be granted. The one result which would be most unfortunate would be if the Court chose to grant consideration to the rather routine issues raised here and deny review of the more fundamental LOLA questions as to which there is a marked split in the circuits.

Respectfully submitted,

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